

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**Caption in Compliance with D.N.J. LBR 9004-2(c)**

WNI 16-016765  
Shapiro & DeNardo, LLC  
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ATTORNEYS FOR MIDFIRST BANK

IN RE:

SCOTT MICHAEL BAYLES AND GERALDINE  
MARIE BAYLES, DEBTORS



Order Filed on November 14, 2019  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

CASE NO.: 19-17417-MBK

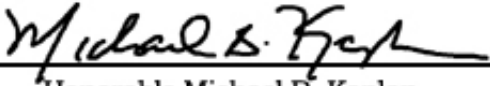
JUDGE: HONORABLE MICHAEL B.  
KAPLAN

CHAPTER: 13

**CONSENT ORDER RESOLVING MOTION TO VACATE STAY**

The relief set forth on the following pages, numbered two (2) through two (2) is hereby ORDERED.

DATED: November 14, 2019

  
Honorable Michael B. Kaplan  
United States Bankruptcy Judge

This matter being opened to the Court by Shapiro & DeNardo, LLC, Attorneys for MidFirst Bank, hereinafter "Secured Creditor", upon the filing of a Notice of Motion for an Order Vacating Stay in a Chapter 13 Case for failure of the Debtors to make post-petition payments on a mortgage obligation and due notice of said Motion and the supporting Certification having been given by mail to the Trustee, the Debtors and the attorney for the Debtors, if any AND CONSENT OF THE PARTIES APPEARING HEREON and for good cause shown,


1. Debtors are currently delinquent in post-petition payments to Secured Creditor for the months of July 1, 2019 through October 1, 2019 in the total amount of \$9,072.32.
2. Debtors agree to capitalize the post-petition delinquency outlined in Paragraph one (1), \$9,072.32, to be paid to Secured Creditor through the remaining Chapter 13 Plan
3. Starting November 1, 2019, Debtors agree to maintain all contractually due payments to Secured Creditor, which currently amount to \$2,268.08.
4. Payments should be submitted to the Secured Creditor via Certified Check to the below address:

Wells Fargo Home Mortgage  
PO Box 14507  
Des Moines, IA 50306

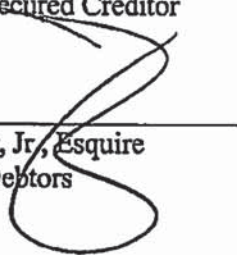
5. If the Debtor(s) fails to make any payments detailed in this Consent Order within thirty (30) days of the date the payments are due, or if any of the funds paid fail to clear for insufficient funds or are dishonored for any reason, then the Secured Creditor may send Debtor and Debtor's Counsel a written notice of default of this Consent Order. If the default is not cured within ten (10) days of such notice, Mortgagee may obtain an Order Vacating the Automatic Stay as to the Collateral by submitting a Certification of Default to the Bankruptcy Court, specifying the Debtor(s) failure to comply with this Consent Order, with a copy of any application, supporting certification, and proposed Order to be served on the Chapter 13 Standing Trustee, Debtor(s) Counsel and Debtor(s) as required by the local bankruptcy rules.

We hereby consent to the form, content,  
and entry of the within Order.

Shapiro & DeNardo, LLC

  
Charles G. Wohlrab, Esquire  
Attorney for the Secured Creditor

Date: 11-4-19

  
William H. Oliver, Jr., Esquire  
Attorney for the Debtors

Date: 11/4/19